

EXHIBIT I

Jason Kenny

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

SOLOMAN OLUDAMISI AJIBADE and)
ADENIKE HANNAH AJIBADE, as)
natural parents of Mathew)
Ajibade, and)
)
THE ESTATE OF MATHEW AJIBADE)
and CHRIS OLADAPO, its)
Executor,)
)
Plaintiffs,)CIVIL ACTION NO.
)
vs.)4:16-CV-82-WTM-GRS
)
JOHN WILCHER, in his official)
capacity as Chatham County)
Sheriff, et al.,)
)
Defendants.)

VIDEOTAPED DEPOSITION OF

JASON KENNY

September 12, 2016

9:34 a.m.

218 West State Street
Savannah, Georgia

Mynjuan P. Jones, RPR, CCR-B-1422

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19 Also Present:
20 Debra Johnson
21 Gregory Brown
22 Dave Liebhauser, Videographer
23
24
25

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1 A. A muffle.

2 Q. Okay. You didn't hear the noise of the
3 Taser?

4 A. No. That doesn't sound like a Taser to
5 me.

6 Q. Okay. Just move it forward.

7 MR. CASH: That was a minute one second
8 one.

9 Q. (By Mr. O'Mara) Stop. What are you doing
10 there?

11 A. I drive-stun him.

12 Q. Where did you get him?

13 A. On the thigh.

14 Q. Where on the thigh?

15 A. Like the middle right thigh.

16 Q. You pointed to -- and you can't be seen on
17 the camera. You want to just stand up and tell us
18 where that is.

19 A. Right here (indicating), middle thigh,
20 middle right thigh.

21 Q. What do you mean by middle when you say
22 middle --

23 A. The middle. Am I saying that right?

24 Q. I don't know. It's your testimony.

25 A. Is this the middle? The middle, you cut

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1 in half, this is the middle, like that (indicating).

2 Q. Okay. And that -- it's your testimony
3 that's where you drive-stunned him on this video?

4 A. That looks like -- from the video that
5 looks like wherever --

6 Q. Okay. Let's let it run. I think that's
7 about it. Let's back up about 15 seconds and see
8 where we are.

9 MR. CASH: I'm going to start at a minute
10 one.

11 MR. O'MARA: Back up some more. Just back
12 up another 15 seconds from there.

13 MR. CASH: Okay. This would be a second
14 forty-seven.

15 Q. (By Mr. O'Mara) Okay. Stop. Now, we are
16 where we are before, which is what I -- where is
17 that?

18 A. The thigh.

19 Q. Okay. And that's the -- would you agree
20 that's the upper thigh?

21 A. Yes.

22 Q. And it is looking on top of, is it not,
23 the actual underwear that he has on him; is that
24 accurate?

25 A. Uh-huh.

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1 Q. Okay. Let's just let it run. How long
2 did you drive-stun him that time?

3 A. I don't remember. I think that was the
4 five-second one. I don't remember which amount of
5 time. I know I try not -- that was the only time I
6 gave him -- I did a five-second one, but I don't
7 remember exact time.

8 Q. And what is that other noise that you hear
9 as you're drive-stunning him?

10 A. Him screaming.

11 Q. Do you remember where in the scheme of the
12 other drive-stuns this one was?

13 A. (Shakes head negatively).

14 Q. You have to answer out loud.

15 A. No, ma'am.

16 Q. This seems to have -- from the --
17 presuming for the today's moment that the timing is
18 accurate, that was earlier on in the process and that
19 there were drive-stuns afterwards? Does that make
20 sense to you or no?

21 A. I really don't recall.

22 Q. So tell me what happened with the last
23 drive-stun, whenever that was, whichever video this
24 was. Tell me about that one.

25 A. After?

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1 Q. You decided to use the Taser?

2 A. Yes.

3 Q. Four times, correct?

4 A. Yes.

5 Q. You decided to make sure you got him in
6 the restraint chair, correct?

7 A. Yes.

8 Q. Those are all decisions you made based
9 upon the available information, correct?

10 A. Yes.

11 Q. And your duties, right?

12 A. Yes.

13 Q. I'm asking whether or not those decisions
14 that you made would have been different if you had
15 the information available to you that he was a mental
16 health concern and that he had come into the jail
17 with some mental health medication? Would that have
18 impacted your decision?

19 A. No.

20 Q. None whatsoever?

21 A. He would still have to go in the restraint
22 chair.

23 Q. Okay. One thing you said was you would
24 have put him in the detox cell to be observed?

25 A. Yes.